



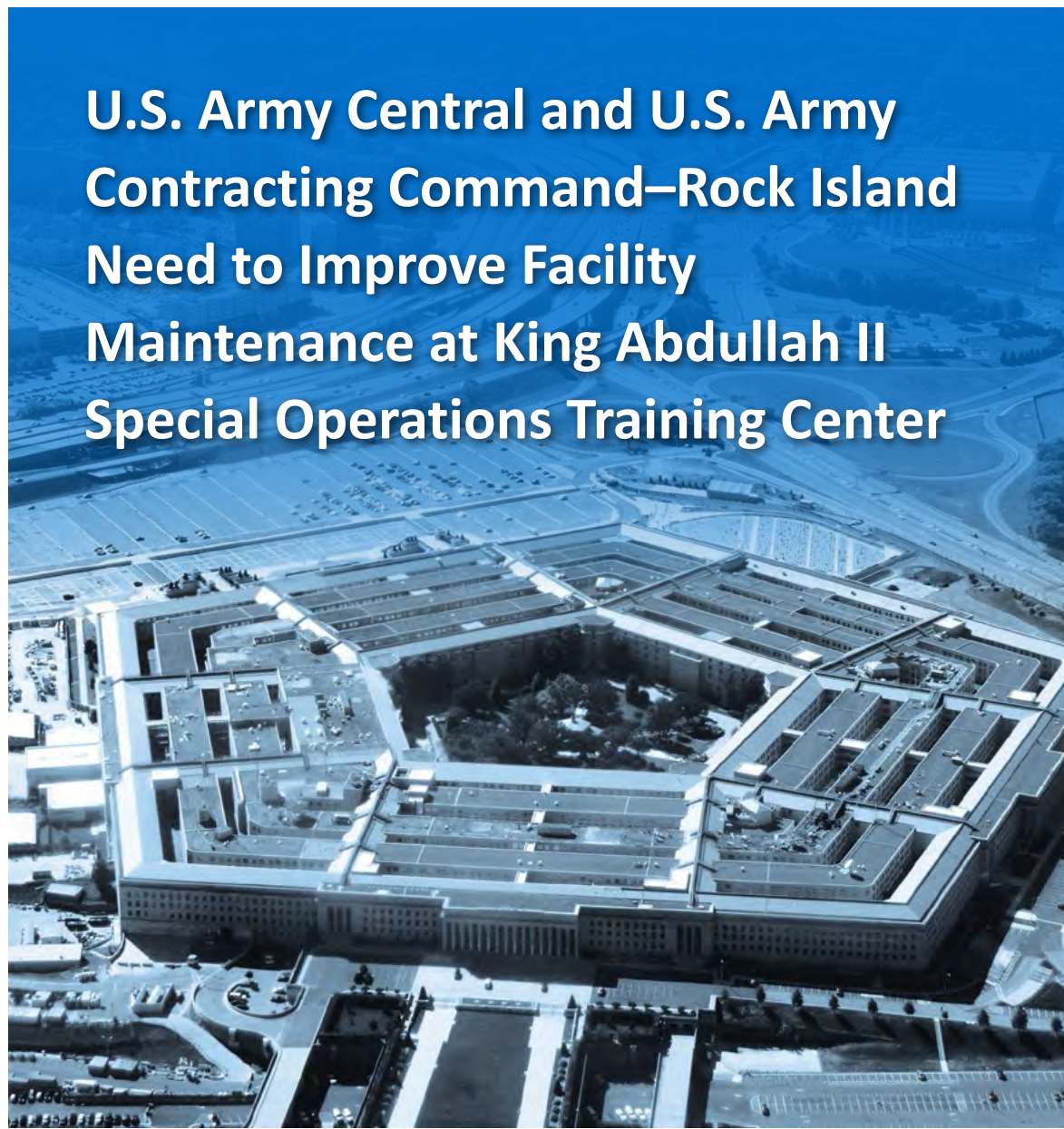
INSPECTOR GENERAL

U.S. Department of Defense

MARCH 23, 2016



U.S. Army Central and U.S. Army Contracting Command–Rock Island Need to Improve Facility Maintenance at King Abdullah II Special Operations Training Center



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Results in Brief

U.S. Army Central and U.S. Army Contracting Command–Rock Island Need to Improve Facility Maintenance at King Abdullah II Special Operations Training Center

March 23, 2016

Objective

We determined whether DoD effectively maintained facilities at King Abdullah II Special Operations Training Center (KASOTC).

Finding

U.S. Army Central (ARCENT) and U.S. Army Contracting Command–Rock Island (ACC–RI) officials did not effectively maintain facilities at KASOTC. Specifically,

- The contractor did not install fire extinguishers and smoke detectors in the Combined Operations and Information Center latrines in accordance with the contract because the contracting officer's representative did not effectively monitor the contractor's performance;
- Mold/mildew accumulated within the showers at four lodging facilities because ACC–RI and ARCENT officials did not include a requirement in the contract to prevent and remove mold/mildew;
- ACC–RI officials did not incorporate the clause for safety of facilities, infrastructure, and equipment for military operations into the contract because ACC–RI officials mistakenly omitted the clause from the contract;
- The procedures for conducting heating, ventilation, and air conditioning repair and replacement for the Combined Operations and Information Center and the dining facility were

Finding (cont'd)

ineffective because ARCENT and ACC–RI officials did not develop appropriate requirements in the contract for heating, ventilation, and air conditioning repair and replacement times;

- ARCENT officials could not verify that the contractor completed facility repairs in accordance with contract requirements because ARCENT officials did not create a reliable process to track repairs; and
- ACC–RI and ARCENT officials did not verify that KASOTC facilities received periodic maintenance in accordance with the contract because ACC–RI and ARCENT officials were not effectively overseeing the contractor's performance.

As a result, U.S. military personnel at KASOTC may be at risk of illness, injury, or death. Also, DoD may not be getting the best value for its money for the base operations services. We informed the Director, U.S. Central Command Forward–Jordan of our health and safety concerns on August 28, 2015, and the Director took immediate action to have the facilities inspected.

Recommendations

Among other recommendations, we recommend that the Commanding General, ARCENT, ensure the contractor is completing facility repairs and periodic maintenance in accordance with the contract. Also, we recommend that the Executive Director, ACC–RI, in coordination with the Commanding General, ARCENT, review and modify the basic life support services contract, as necessary, to resolve the problems identified in this report.

Management Comments and Our Response

The Chief, G4 Plans, ARCENT, responding for the Commanding General, ARCENT; and the Executive Director, ACC–RI, addressed all specifics of the recommendations, and no further comments are required. Please see the Recommendations Table on the back of this page.

Recommendations Table

Management	Recommendations Requiring Comment	No Additional Comments Required
Commanding General, U.S. Army Central		2,3
Executive Director, U.S. Army Contracting Command-Rock Island		1.a, 1.b, 1.c



**INSPECTOR GENERAL
DEPARTMENT OF DEFENSE
4800 MARK CENTER DRIVE
ALEXANDRIA, VIRGINIA 22350-1500**

March 23, 2016

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR ACQUISITION,
TECHNOLOGY AND LOGISTICS
COMMANDER, U.S. CENTRAL COMMAND
AUDITOR GENERAL, DEPARTMENT OF THE ARMY

SUBJECT: U.S. Army Central and U.S. Army Contracting Command–Rock Island Need to
Improve Facility Maintenance at King Abdullah II Special Operations Training Center
(Report No. DODIG-2016-065)

We are providing this report for your information and use. This project relates to the overseas contingency operation, Operation Inherent Resolve. We determined that U.S. Army Central and U.S. Army Contracting Command–Rock Island should take action to resolve significant health and safety concerns that could endanger troops at King Abdullah II Special Operations Training Center. We conducted this audit in accordance with generally accepted government auditing standards. We considered management comments on the draft of this report when preparing the final report. Comments from the U.S. Army Central and U.S. Army Contracting Command–Rock Island conformed to the requirements of DoD Instruction 7650.03; therefore, we do not require additional comments.

We appreciate the courtesies extended to the staff. Please direct questions to me at (703) 604-9187.

A handwritten signature in blue ink, appearing to read "M. Roark", is positioned above the name of the Assistant Inspector General.

Michael J. Roark
Assistant Inspector General
Contract Management and Payments

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Acronyms and Abbreviations

Introduction

Objective

We determined whether DoD effectively maintained facilities at King Abdullah II Special Operations Training Center (KASOTC). See the Appendix for a discussion of the scope and methodology and prior audit coverage. This project relates to the overseas contingency operation, Operation Inherent Resolve.

Concurrent with our audit, the DoD Office of Inspector General (DoD OIG) Technical Assessment Directorate performed an inspection of electrical and fire protection systems to verify compliance with DoD health and safety policies and standards, and conducted a radiation survey to determine whether background radiation levels from foreign building materials posed an unacceptable health risk. The DoD OIG Technical Assessment Directorate will report its inspection results in a separate report.

Background

King Abdullah II Special Operations Training Center

KASOTC, located in Jordan, provides reality-based training for special operations forces, counter-terrorism units, and law enforcement agencies. The Jordanian government, which owns and operates the facility, designed the center with the U.S. Government in response to an unpredictable international security environment. Specifically, the U.S. appropriated \$99 million,¹ which partially financed the construction of KASOTC.



U.S. Central Command (USCENTCOM) Forward-Jordan is a forward-deployed command element subordinate to USCENTCOM that operates from KASOTC. USCENTCOM Forward-Jordan coordinates between the U.S. and Jordanian governments on behalf of U.S. organizations that include the U.S. Agency for International Development, the U.S. State Department, and the Military Services.

¹ Public Law 109-13, "The Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Tsunami Relief," May 11, 2005.

U.S. Army Central (ARCENT) is the Army Component of USCENTCOM and is USCENTCOM's Coalition Forces Land Component Command responsible for planning, coordinating, and employing land forces.

Basic Life Support Services Contract

The U.S. Army Contracting Command–Rock Island (ACC–RI) awarded a firm-fixed-price sole-source contract² to the KASOTC Company for basic life support services in support of USCENTCOM Forward–Jordan, effective March 28, 2014. Contract W52P1J-14-C-0009 has a period of performance of 1 base year plus four 1-year-evaluated option periods. The base year of the contract had an initial award value of \$6.1 million, and was increased to \$6.7 million by the end of the base year. Option Year 1 was exercised and incrementally funded in the amount of \$9.6 million, and increased to \$11.4 million after a June 25, 2015, modification to the contract.

The contract provides basic life support services at KASOTC, including food, water, lodging, laundry, internet service, sanitation, and facility maintenance. The contract also provides support services for specific facilities at KASOTC, including lodging (11 accommodation and Ultimate Building Machine [UBM] buildings³), gym, track, soccer field, Combined Operations and Information Center (COIC), latrines near the COIC, dining facility, and the research and development building.

Contract Surveillance Responsibilities and Requirements

The Federal Acquisition Regulation (FAR)⁴ states that contracting officers are required to ensure the performance of all necessary actions for effective contracting, ensure compliance with the terms of the contract, and safeguard the interests of the U.S. in its contractual relationships. However, contracting officers often delegate specific authority to members of the requiring activity, known as contracting officer's representatives (CORs), to conduct contract surveillance, verify that the contractor is fulfilling contract delivery and quality requirements, and document performance for the contract record.

According to the FAR,⁵ the performance work statement (PWS) defines contract performance requirements and enables the assessment of work performance against measurable performance standards. The quality assurance surveillance plan (QASP) is a tool for the COR to use as a guide to monitor the quality of the contractor's performance and ensure the contractor is compliant with contract

² ACC–RI awarded a sole-source contract because the Jordanian Armed Forces required ACC–RI to use the KASOTC Company for basic life support services at KASOTC. The Jordanian Armed Forces own and control access to KASOTC.

³ The U.S. military uses UBM buildings for lodging and/or office space.

⁴ FAR 1.602, "Contracting Officers," as of April 10, 2015.

⁵ FAR 37.602, "Performance Work Statement," as of May 29, 2014.

requirements. The QASP details how and when the U.S. Government will survey, observe, test, sample, evaluate, and document contractor performance. The FAR⁶ states that the QASP should specify all work requiring surveillance and the method of surveillance.

The contracting officer and the activity responsible for contract requirements share the responsibility to develop and maintain the QASP. According to the FAR,⁷ the activity responsible for technical requirements provides the contracting officer with any specifications for inspection, testing, and other contract requirements essential to ensure the integrity of the supplies of services. The activity responsible for technical requirements for a service contract should also prescribe contract quality requirements through a QASP. Therefore, the activity responsible for technical requirements bears primary responsibility for QASP development and updates, but the contracting officer has ultimate responsibility to ensure that a QASP exists and is effective in its requirements and implementation.

Review of Internal Controls

DoD Instruction 5010.40⁸ requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified internal control weaknesses for monitoring contractor performance at KASOTC. Specifically, controls did not exist for ARCENT officials to verify that ARCENT received the services in the contract because ARCENT officials could not verify completion of work orders or periodic maintenance. We will provide a copy of the report to the senior official responsible for internal controls in the Department of the Army.

⁶ FAR 46.401, "General," as of March 2, 2015.

⁷ FAR 46.103, "Contracting Office Responsibilities," as March 2, 2015.

⁸ DoD Instruction 5010.40, "Managers' Internal Control Program Procedures," May 30, 2013.

Finding

U.S. Army Central and U.S. Army Contracting Command–Rock Island Need to Improve Facility Maintenance at the King Abdullah II Special Operations Training Center

ARCENT and ACC–RI officials did not effectively maintain facilities at KASOTC. Specifically,

- The contractor did not install fire extinguishers and smoke detectors in the COIC latrines in accordance with the terms of the contract because the COR did not effectively monitor the contractor’s performance;
- Mold/mildew accumulated within the showers at four lodging facilities because ACC–RI and ARCENT officials did not include a requirement in the contract to prevent and/or remove mold/mildew;
- ACC–RI officials did not incorporate the clause for safety of facilities, infrastructure, and equipment for military operations into the contract because ACC–RI officials mistakenly omitted the clause from the contract;
- The procedures for conducting heating, ventilation, and air conditioning (HVAC) repair and replacement for the COIC and the dining facility were ineffective because ARCENT and ACC–RI officials did not develop appropriate requirements in the contract for HVAC repair and replacement times;
- ARCENT officials could not verify that the contractor completed facility repairs in accordance with contract requirements because ARCENT officials did not create a reliable process to track repairs; and
- ARCENT and ACC–RI officials did not verify that KASOTC facilities received periodic maintenance in accordance with the contract because the ACC–RI contracting officer received the contractor’s Quality Control Plan (QCP) without a periodic maintenance schedule, and ARCENT officials did not effectively oversee the contractor’s performance.

As a result, U.S. military personnel at KASOTC may be at risk of illness, injury, or death. Also, DoD may not be getting the best value for its money for the base operations services. We informed the Director, USCENTCOM Forward–Jordan of our health and safety concerns on August 28, 2015 and the Director took immediate action to have the facilities inspected.

Fire Extinguishers and Smoke Detectors Were Not Installed in COIC Latrines

The contractor did not install fire extinguishers and smoke detectors in the COIC latrines in accordance with the terms of the contract. In June 2014, ACC-RI modified the contract to upgrade the latrines outside the COIC by August 22, 2014. The modification included an update to the PWS requiring the contractor to install one fire extinguisher and one smoke detector in each of the four COIC latrines. The PWS also required monthly inspections and required the contractor to service the fire extinguishers annually. Upon discovery of a nonoperational smoke detector, the contract required the contractor to replace either the unit or the batteries. This oversight occurred because the COR did not ensure the contractor installed and serviced the COIC latrines with fire extinguishers and smoke detectors. ACC-RI, in coordination with ARCENT, should notify the contractor of the deficient performance and hold the contractor responsible, in accordance with the terms of the contract, for not providing and maintaining fire extinguishers and smoke detectors in the COIC latrines.

Lodging Facilities Required Treatment for Mold/Mildew

Mold/mildew accumulated within the showers at four lodging facilities housing U.S. personnel at KASOTC. During our site visit to KASOTC, we observed mold/mildew in the showers at four lodging facilities (Figure 2). We contacted the USCENTCOM Forward-Jordan Surgeon, who agreed that this could be a problem, and suggested an industrial hygienist be consulted to confirm the type of mold present.



On August 28, 2015, we informed the Director, USCENTCOM Forward-Jordan of the possible mold/mildew and suggested that an industrial hygienist conduct an inspection and provide remediation recommendations according to Army guidance.⁹ On September 15, 2015, an ARCENT official responded on behalf of USCENTCOM Forward-Jordan and stated that the 155th Preventive Medical Detachment inspected the showers in two lodging facilities at KASOTC and determined that the substance was “likely common mildew and not likely invasive black mold.” They

⁹ Army Regulation 420-1, “Army Facilities Maintenance.”

recommended that it could be corrected with effective ventilation of wet areas and more frequent and effective cleaning of the bathrooms where the mold/mildew is located. Specifically, the 155th Preventive Medical Detachment recommended that:

1. Caulk should be removed and mold-resistant caulk should be reapplied in its place.
2. Shower doors should be removed and replaced with mold-resistant shower curtains. These are to be deep-cleaned weekly and sprayed down daily with anti-mold spray cleaner.
3. Vent fans in shower areas should be cleaned and maintained in working order on a regular basis.
4. Small casement windows currently located in shower areas should be replaced with exhaust fans.

The ARCENT official stated that USCENTCOM Forward-Jordan had met with the contractor to address the recommendations. The official stated the contractor would proceed with the recommendations if the contractor could obtain the materials. However, according to the ARCENT official, ACC-RI and ARCENT may need to adjust the contract to install additional fans.

The mold/mildew in the showers occurred because ARCENT and ACC-RI officials did not include a requirement in the contract to prevent and remove mold/mildew. The contract directed that bathrooms “shall be cleaned so that they are free of dust, dirt, lint and human waste, and trash.” However, the contract did not explicitly state that the facilities be free of mold/mildew. ACC-RI and ARCENT should review and modify the basic life support services contract, as necessary, to include measures designed to prevent and remove mold/mildew in all facilities consistent with AR 420-1.

The mold/mildew in the showers occurred because ARCENT and ACC-RI officials did not include a requirement in the contract...

Clause for Safety of Facilities, Infrastructure, and Equipment for Military Operations Needed

ACC-RI officials did not incorporate a required clause into the contract for safety of facilities, infrastructure, and equipment for military operations. Specifically, as prescribed by the Defense Federal Acquisition Regulations Supplement (DFARS) Subpart 246.2,¹⁰ the contracting officer should have included

¹⁰ DFARS 246.2, “Contract Quality Requirements.”

DFARS clause 252.246-7004,¹¹ which implements public law.¹² The DFARS clause requires the contractor to ensure that the facilities, infrastructure, and equipment acquired, constructed, installed, repaired, maintained, or operated under the contract comply with Unified Facilities Criteria¹³ for: (1) fire protection; (2) structural integrity; (3) electrical systems; (4) plumbing; (5) water treatment; (6) waste disposal; and (7) telecommunications networks. The purpose of DFARS Subpart 246.2 is to establish policies and procedures intended to ensure the safety and habitability of facilities, infrastructure, and equipment acquired for use by DoD military or civilian personnel during military operations performed outside the U.S.

This occurred because ACC-RI officials mistakenly omitted the DFARS clause in the contract. Without the DFARS clause to ensure that the contractors were maintaining the base to minimum safety standards, safety deficiencies could exist at KASOTC. For example, in 2015, USCENTCOM Forward-Jordan inspectors identified the following electrical and fire protection discrepancies at KASOTC:

- U.S. electrical inspectors from the 249th Engineering Battalion inspected the facilities at KASOTC and identified 69 British Standard code violations.¹⁴ For example, lodging facilities did not have grounding for electrical distribution, ground fault circuit interrupter outlets were missing, and incorrect size circuit breakers were installed. In August 2015, the U.S. Army engineer at KASOTC stated that his soldiers repaired some of the electrical grounding problems at KASOTC; however, contractor personnel cut the grounding wires afterward. This is a serious safety concern for U.S. military personnel at KASOTC.
- The USCENTCOM Forward-Jordan Fire Chief provided his fire discrepancy spreadsheet, as of August 13, 2015, which contained a total of 188 outstanding fire safety discrepancies evaluated as “High Risk” and 1 outstanding discrepancy evaluated as “Extremely High Risk”. For example, the Fire Chief identified the lack of automated fire suppression systems for four of the five accommodation buildings, and recommended that the third floors be unoccupied and provided with a fire watch. For 30 of the “High Risk” level discrepancies, the contractor reported

U.S. electrical inspectors from the 249th Engineering Battalion inspected the facilities at KASOTC and identified 69 British Standard code violations.

¹¹ DFARS 252.246.7004, “Safety of Facilities, Infrastructure, and Equipment for Military Operations.”

¹² Public Law 111-84, “National Defense Authorization Act for Fiscal Year 2010,” Section 807, “Policy and Requirements to Ensure the Safety of Facilities, Infrastructure, and Equipment for Military Operations.”

¹³ The DFARS clause requires compliance with Unified Facilities Criteria 1-200-01, “General Building Requirements,” which states to use Unified Facilities Criteria 1-201-02, “Assessment of Existing Facilities for Use in Military Operations” to assess existing facilities for life safety and habitability.

¹⁴ The contract requires that the electrical systems comply with British Standard 7671.

that they were “looking for a contractor to correct the issue”. These 30 discrepancies included inadequate fire detection systems in all five accommodation buildings.

In order to mitigate life, health, and safety risks, ACC–RI, in coordination with ARCENT, should review and modify the basic life support services contract, as necessary, to include the DFARS clause 252.246-7004.

Contract Terms for HVAC Response Times Need Improvement

The procedures for conducting HVAC repair and replacement for the COIC and the dining facility were ineffective because ARCENT and ACC–RI officials did not develop appropriate requirements in the contract for HVAC repair and replacement times. A USCENTCOM regulation¹⁵ provides guidance for U.S. personnel use of host nation facilities. Specifically, the regulation directs that facilities constructed for host nation personnel should be constructed in accordance with Unified Facility Criteria.¹⁶ The Unified Facility Criteria require all spaces intended for occupancy be provided with ventilation, and recommend air conditioning to protect the life safety and health of the occupants. In implementing this requirement, the USCENTCOM regulation sets the following priorities from highest to lowest for facility HVAC requirements:

1. mission,
2. medical,
3. dining facilities, and
4. billeting (lodging).

The contract HVAC repair priorities were inconsistent with the priorities established in the USCENTCOM regulation. Specifically, the requirements to repair or replace the HVAC systems for nine lodging facilities, which should be the number four priority, and three office buildings, which should be the number one priority, was 24 hours. However, HVAC repair/replacement for the COIC, which should be the number one priority, was 14 days and up to 30 days if the contractor provided a plan for the repair. The dining facility, which should be the number three priority, had no contract requirements at all. In order to mitigate operational risk, ACC–RI, in coordination with ARCENT, should review and modify the HVAC response/repair/replacement times in the basic life support services contract, as necessary, to be consistent with priorities established in the USCENTCOM regulation.

¹⁵ U.S. Central Command Regulation 415-1, Construction in the USCENTCOM Area of Responsibility, “The Sand Book,” July 18, 2014.

¹⁶ Unified Facility Criteria 1-202-01, “Host Nation Facilities in Support of Military Operations,” September 1, 2013.

ARCENT Could Not Verify It Received Facility Repairs

ARCENT officials could not verify that the contractor completed facility repairs in accordance with the terms of the contract. This occurred because ARCENT officials did not create a reliable process to track work orders for repairs to facilities. According to ARCENT officials, ARCENT did not have a process in place to track work orders until March 2015, about a year after the contract started. After March 2015, ARCENT experienced internal control shortfalls in its work order process. Specifically, as of August 2015, we identified numerous errors in its work order documentation, which made its records unreliable. For example:

- The work order form did not have a signature or date when the contractor completed the repair. Instead, the contractor would send a status update via e-mail to the ARCENT officials who would update ARCENT's spreadsheet used to track work orders. However, we tested the accuracy of the data in the spreadsheet that ARCENT used for August 2015. We non-statistically selected 11 of 49 work orders on the spreadsheet to determine whether the status (completed or not completed repair) was correct, and determined that 3 of the 11 had the incorrect status. We determined that ARCENT's spreadsheet for August 2015 was not reliable and should not be used to evaluate the contractor's performance.
- We identified discrepancies between the number of contractor work orders, the number of ARCENT work orders, and the number of work orders in the ARCENT spreadsheet for the months of May, June, and July 2015. Either the contractor or an ARCENT official may create a work order depending on who initiates the maintenance request. As shown in Table 1, we requested and reviewed three sets of records, but there were discrepancies between the total work orders across all three months.

Table 1. Total Maintenance Work Orders

Month	Contractor	ARCENT	ARCENT Tracking Spreadsheet
May	85	93	84
June	92	104	102
July	58	65	65
Total	235*	262	251

* There were additional email submissions that did not have serial numbers because they did not go through ARCENT for serialization (23 in May 2015, 13 in June 2015, and 23 in July 2015).

- ARCENT and the contractor did not adequately complete work orders. Specifically, there were duplicate, missing, and incomplete work orders. For example, ARCENT personnel duplicated work order number 0727-001; however, the two work orders were for different buildings, different room numbers, and different maintenance requests.

ARCENT should revise its work order process to provide verifiable information that the contractor performed facility repairs in accordance with the contract.

ARCENT and ACC–RI Could Not Verify It Received Periodic Facility Maintenance

ARCENT and ACC–RI officials could not verify that KASOTC facilities received periodic maintenance in accordance with the terms of the contract. This occurred because the ACC–RI contracting officer received the contractor’s QCP without a periodic maintenance schedule,¹⁷ and ARCENT officials did not have adequate controls in place to oversee the contractor’s performance for completing the periodic maintenance.

According to the FAR,¹⁸ contracting officers are responsible for ensuring performance of all necessary actions for effective contracting, ensuring compliance with the terms of the contract, and safeguarding the interests of the U.S. in its contractual relationships. The PWS requires the contractor to develop and implement a QCP to ensure that its work complies with the requirements of the contract. Additionally, ARCENT is responsible for developing a QASP that allows oversight of the contract performance requirements.

The contracting officer received the contractor’s QCP without a schedule of required periodic maintenance. Specifically, the contract had 18 periodic maintenance requirements in the PWS; however, the contractor’s QCP and ARCENT’s QASP only listed 2 of 18 and 7 of 18 periodic maintenance requirements, respectively. For example, the contractor’s QCP and ARCENT’s QASP did not have any controls to oversee whether the COIC latrines had working fire extinguishers. If controls had been in place, ARCENT officials could have determined that fire extinguishers had not even been installed. See Table 2 for details on contractor’s QCP and ARCENT’s QASP to oversee each of the contractor’s periodic maintenance requirements.

¹⁷ A periodic maintenance schedule should detail when all periodic maintenance is occurring at KASOTC.

¹⁸ FAR Part 1, Subpart 1.6, “Career Development, Contracting Authority, and Responsibilities,” and Subpart 1.602-2, “Responsibilities.”

Table 2. Oversight of Periodic Maintenance Requirements in the PWS

PWS Requirements for Periodic Maintenance	Facilities	Frequency of Periodic Maintenance in PWS	Controls in Contractor's QCP?	Controls in ARCENT's QASP for Oversight?
Clean bathrooms	Accommodations	Daily	Yes	Yes
Cleaning	COIC latrines	Daily	Yes	Yes
Cleaning of latrines	UBM 5 and 6	Daily	No	Yes
Cleaning of bathrooms	UBM 5 and 6	Weekly	No	Yes
Dumpster cleaning	UBM 5 and 6	Daily	No	Yes
Sanitize dumpster	COIC area	Weekly	No	Yes
Sanitize dumpsters	UBM 5-6	Weekly	No	Yes
Cleaning schedule	Dining Facility	Varies	No	No
Dumpster inspection	COIC area	Routinely	No	No
Fire Extinguisher inspection	COIC latrines	Monthly	No	No
Fire Extinguisher servicing	COIC latrines	Annually	No	No
Hazmat removal	Base wide	Weekly	No	No
Pest control service	Accommodations	Monthly	No	No
Pest control service	COIC	Monthly	No	No
Pressure washing	COIC latrines	Quarterly	No	No
Pressure wash dumpsters offsite	COIC area	Twice annually	No	No
Sanitize	COIC latrines	Quarterly	No	No
Smoke alarm inspection	COIC latrines	Monthly	No	No

ACC-RI and ARCENT should request a schedule of periodic maintenance from the contractor that includes all 18 periodic maintenance requirements. After ARCENT receives the schedule from the contractor, ARCENT should revise the QASP to include controls to oversee the contractor's performance in completing the required periodic maintenance, and then implement the controls.

Conclusion

ARCENT and ACC-RI had significant health and safety concerns that could endanger personnel at KASOTC. Specifically, these concerns include the lack of fire extinguishers and smoke detectors in the COIC latrines, the discovery of mold/mildew, and the lack of safety standards in the contract, which creates a significant, but avoidable risk, to assigned U.S. military personnel. ARCENT and ACC-RI officials should take action to resolve these health and safety problems. Additionally, ARCENT and ACC-RI may not be getting the best value for its money for base operations services at KASOTC.

Recommendations, Management Comments, and Our Response

Recommendation 1

We recommend that the Executive Director, U.S. Army Contracting Command–Rock Island, in coordination with the Commanding General, U.S. Army Central:

- a. Notify the contractor of the deficient performance and hold the contractor responsible, in accordance with the terms of the contract, for not providing and maintaining fire extinguishers and smoke detectors in the COIC latrines.**

Executive Director, U.S. Army Contracting Command–Rock Island Comments

The Executive Director, who also serves as the Principal Assistant Responsible for Contracting, agreed. She stated that, on October 20, 2015, the Quality Assurance Specialist issued a non-conformance report to the contractor and the contractor corrected all the deficiencies by installing fire extinguishers and smoke detectors as required. Further, the Executive Director stated that the fire extinguishers and smoke detectors are and will continue to be checked through monthly COR and Quality Assurance Specialist surveillance.

b. Review and modify the basic life support services contract (W52P1J-14-C-0009), as necessary, to:

- (1) include cleaning procedures that include measures to prevent and remove mold/mildew in all the facilities consistent with AR 420-1;**

Executive Director, U.S. Army Contracting Command–Rock Island Comments

The Executive Director agreed, stating that the general cleaning requirement of the showers should have been sufficient to prevent mold/mildew. The Executive Director stated that ARCENT had an industrial hygienist review the accommodations and make recommendations for corrective actions. She also stated that the industrial hygienist determined that it was common mildew, not mold. The Executive Director stated that the contractor: (1) replaced the doors to the showers with shower curtains to allow for better ventilation to the showers stalls; (2) re-caulked the showers with anti-mold/mildew caulking; and (3) was in the process of replacing window in the shower areas with ventilation fans. She also stated that mold/mildew has been added to the PWS and will be incorporated in the contract by June 30, 2016. The Executive Director stated that the QASP has been updated to add surveillance of this section of the PWS.

- (2) include the Defense Acquisition Regulation Supplement clause 252.246-7004; and**

Executive Director, U.S. Army Contracting Command–Rock Island Comments

The Executive Director agreed, stating that the DFARS clause 252.246-7004 will be added to the contract no later than March 30, 2016.

- (3) make the heat, ventilation, and air conditioning response time and repair/replace time consistent with priorities established in the U.S. Central Command Regulation 415-1.**

Executive Director, U.S. Army Contracting Command–Rock Island Comments

The Executive Director agreed, stating that the PWS will be revised to include repair times that conform to established USCENTCOM regulations for HVAC systems. She stated that the change will be incorporated into the contract with an estimated completion date of June 30, 2016. She also stated that the Contingency Contracting Administration Services team confirmed that the COIC industrial HVACs are not part of the KASOTC basic life services support contract. She stated that the industrial HVACs are currently being repaired through the use of an Acquisition Cross-Service Agreement; however, the revised PWS will include the requirement to maintain the COIC industrial HVACs.

- c. Request a periodic schedule of maintenance from the contractor that contains all the periodic maintenance required by the contract.**

Executive Director, U.S. Army Contracting Command–Rock Island Comments

The Executive Director agreed, stating that the contracting officer and COR asked the contractor to provide an updated QCP that includes a schedule of periodic maintenance covering all 18 areas identified in the findings. She stated that the updated QCP will be reviewed and the QASP will be updated to include these 18 areas. However, she stated that the QASP provides guidance on essential areas that a COR should inspect and does not list every aspect individually. The Executive Director stated that the Contingency Contracting Administration Services quality assurance specialist developed a surveillance checklist that mirrors the PWS and is used to evaluate the entire contract. She stated that these checklists have been in use since September 2015.

Our Response

Comments from the Executive Director addressed all specifics of the recommendation, and no further comments are required.

Recommendation 2

We recommend that the Commanding General, U.S. Army Central revise its work order process to provide verifiable information that the contractor performed facility repairs in accordance with the basic life support services contract (W52P1J-14-C-0009).

Commanding General, U.S. Army Central Comments

The Chief, G4 Plans, ARCENT, responding for the Commanding General, ARCENT, agreed, stating that representatives from ARCENT, Combined Joint Operations Command – Jordan, and Jordanian Armed Forces meet weekly to provide an updated status on outstanding work orders for facility repairs. The Chief stated that as of December 2015, the Combined Joint Operations Command – Jordan and Task Force Power took actions to address and mitigate all critical fire, electrical, and safety issues.

Our Response

Comments from the Chief, G4 Plans, ARCENT, addressed all specifics of the recommendation, and no further comments are required.

Recommendation 3

We recommend that the Commanding General, U.S. Army Central, upon receiving the periodic schedule of maintenance from the contractor, revise the Quality Assurance Surveillance Plan to include controls to oversee the contractor's performance in completing the required periodic maintenance, and then implement the controls.

Commanding General, U.S. Army Central Comments

The Chief, G4 Plans, ARCENT, responding for the Commanding General, ARCENT, agreed. The Chief stated that the ARCENT G4 Operational Contract Support Coordination Cell, in coordination with ARCENT safety and engineers, was working with the contracting officer to modify the current contract to include essential fire, engineer, and safety information that were noted as deficiencies. The Chief stated that changes will include updating the QASP to include controls to oversee the contractor's performance. The Chief stated that the ARCENT Coalition Requirements Review Board validated the modified contract and ACC-RI is expected to sign the contract by March 31, 2016.

Our Response

Comments from the Chief, G4 Plans, ARCENT, addressed all specifics of the recommendation, and no further comments are required.

Additional Comments from the Commanding General, U.S. Army Central Comments

The Chief, G4 Plans, ARCENT, stated that ARCENT G4 Operational Contract Support Coordination Cell took actions to improve COR oversight at KASOTC and across the ARCENT Area of Responsibility. Specifically, the Chief stated that ARCENT G4 and the Operational Contract Support Coordination Cell Chief visited Jordan in July 2015 to examine the basic life services support contract and QASP. Additionally, the Chief stated that ARCENT resumed the Quarterly Contract Review Board in September 2015 to evaluate the performance of all ARCENT contracts. Finally, the Chief stated that ARCENT hosted multiple training sessions in FYs 2015 and 2016 to improve the writing and management of contracted requirements.

Appendix

Scope and Methodology

We conducted this performance audit from July 2015 through February 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Review of Documentation, Interviews, and Observations

To understand the KASOTC contract requirements, we obtained and reviewed the:

- basic life support services contract (contract number W52P1J-14-C-0009) and 9 contract modifications;
- PWS, as of June 9, 2015;
- QASP, as of March 24, 2015;
- COR monthly reports;
- ARCENT work order forms and ARCENT's spreadsheet used to track work orders;
- contractor's work order forms and daily status reports; and
- other relevant contract documentation.

We conducted a site visit to KASOTC in August 2015. To determine and verify maintenance issues in the facilities, we physically observed and photographed maintenance problems, including the mold/mildew problems in the lodging facilities. To identify maintenance concerns from U.S. service members, we distributed a survey while on site and we received and reviewed 32 responses. Also, we non-statistically selected 11 of 49 work orders on ARCENT's spreadsheet to determine whether the status (completed or not completed repair) was correct.

To understand responsibilities for the KASOTC contract and the controls in place for monitoring contractor compliance, we contacted officials at:

- Under Secretary of Defense for Acquisition, Technology and Logistics;
- USCENCOM;
- Joint Staff, J-4;
- U.S. Army Contracting Command, Headquarters;
- ACC-RI; and
- ARCENT.

Use of Computer-Processed Data

We did not use computer-processed data to perform this audit.

Use of Technical Assistance

We did not use technical assistance to perform this audit.

Prior Coverage

During the last 5 years, the Department of Defense Inspector General (DoD IG) issued one report discussing contractor support at KASOTC. Unrestricted DoD IG reports can be accessed at <http://www.dodig.mil/pubs/index.cfm>.

DoD IG

DODIG-2015-160, "U.S. Army Generally Designed Adequate Controls to Monitor Contractor Performance at the King Abdullah II Special Operations Training Center, but Additional Controls Are Needed," August 7, 2015

Management Comments

U.S. Army Central



DEPARTMENT OF THE ARMY
UNITED STATES ARMY CENTRAL
1 GABRESKI DRIVE
SHAW AIR FORCE BASE, SUMTER, SC 29152

ACLG-P

8 March 2016

SUBJECT: U. S. Army Central (USARCENT) G4 Operational Contract Support response to Department of Defense Inspector General (DODIG) D2015-D000CJ-0208.000 Draft Report "Audit of Facility Maintenance at KASOTC"

1. **PURPOSE.** The purpose of this memorandum is to provide a formalized response to the DODIG's draft report titled "Audit of Facility Maintenance at KASOTC" on behalf of the USARCENT G4 Operational Contract Support Coordination Cell (OCS-CC).

2. **DISCUSSION.** The DODIG's draft report outlines findings made during an inspection of Base Life Support (BLS) services at the King Abdullah II Special Operations Training Center (KASOTC). This report finds that USARCENT did not effectively maintain contract oversight of facilities at KASOTC.

3. **ACTIONS TAKEN.** The USARCENT OCS-CC has reviewed and concurs with the DODIG's proposed recommendations. The following actions were taken in response to the DODIG's Recommendations 2 and 3.

a. Recommendation 2. On a weekly basis, representatives from USARCENT, Combined Joint Operations Command – Jordan (CJOC-J), Jordanian Armed Forces conduct a mayor cell maintenance facilities meeting in order to provide an updated status on outstanding work orders for facility repairs. As of December 2015, measures have been taken to address and mitigate all critical fire, electrical and safety issues by CJOC-J and Task Force Power.

b. Recommendation 3. The USARCENT OCS-CC, in coordination with USARCENT Safety and Engineers, is currently working with the Contracting Officer to modify the current contract to include essential fire, engineer, and safety information that were noted as deficiencies in the inspection. This includes updating the Quality Assurance Surveillance Plan (QASP) to include controls to oversee the contractor's performance. The modified contract was validated by the USARCENT Coalition Requirements Review Board and is expected to be signed by Army Contracting Command – Rock Island by 31 March 2016.

4. **ADDITIONAL INFORMATION.** The USARCENT OCS-CC has taken the following actions to improve Contract Officer Representative (COR) oversight both at KASOTC and across the USARCENT Area of Responsibility.

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U.S. Army Central (cont'd)

ACLG-P

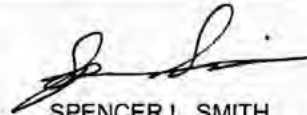
SUBJECT: U. S. Army Central (USARCENT) G4 Operational Contract Support response to DODIG D2015-D000CJ-0208.000 Draft Report "Audit of Facility Maintenance at KASOTC"

a. In July 2015 the USARCENT G4 and OCS-CC chief conducted a Staff Assisted Visit (SAV) with the OCS cell in Jordan to examine the BLS contract and QASP in place at KASOTC. These SAVs assist tactical level OCS entities with contract support to include COR oversight.

b. In September 2015, the USARCENT resumed the execution of the Quarterly Contract Review Board. This board evaluates the performance (to include evaluation of the QASP) of all USARCENT contracts currently being executed.

c. In fiscal years 2015 and 2016 the USARCENT OCS-CC hosted five Operational Contract Support (3C) Courses at Shaw Air Force Base and Camp Arifjan which improved the writing and management of contracted requirements. This includes writing comprehensive performance work statements and QASPs. The CORs currently in place at KASOTC in Jordan are graduates of this course.

5. The point of contact for this memorandum is [REDACTED],
USARCENT OCS Chief, at [REDACTED] or [REDACTED],
USARCENT G4 OCS Plans Officer, at [REDACTED].



SPENCER L. SMITH
COL, LG
Chief, G4 Plans

UNCLASSIFIED

U.S. Army Contracting Command–Rock Island



DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY MATERIEL COMMAND
4400 MARTIN ROAD
REDSTONE ARSENAL, AL 35898-5000

AMCIR

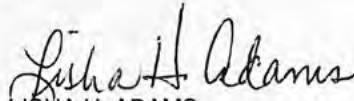
02 MAR 2016

MEMORANDUM FOR Department of Defense Inspector General (DoDIG),
[REDACTED], Program Director, Contract Management and Payments
Directorate, [REDACTED]

SUBJECT: Command Comments on DoDIG Draft Report: U.S. Army Central and U.S. Army Contracting Command-Rock Island Need to Improve Facility Maintenance at King Abdullah II Special Operations Training Center, Project D2015-D000CJ-0208.

1. The U.S. Army Materiel Command (AMC) has reviewed the subject draft report and the response from the U.S. Army Contracting Command (ACC). AMC endorses the enclosed ACC response.
2. The AMC point of contact is [REDACTED]
or [REDACTED]

Encl


LISHA H. ADAMS
Executive Deputy to the
Commanding General

U.S. Army Contracting Command–Rock Island (cont'd)



DEPARTMENT OF THE ARMY
U.S. ARMY CONTRACTING COMMAND
4505 MARTIN ROAD
REDSTONE ARSENAL, AL 35898-5000

REPLY TO
ATTENTION OF:

22 FEB 2016

AMSCC-IR

MEMORANDUM FOR [REDACTED], Director, Internal Review and Audit
Compliance Office, Headquarters, U.S. Army Materiel Command, [REDACTED]
[REDACTED]

SUBJECT: DODIG Report, U.S. Army Central and U.S. Army Contracting Command–
Rock Island Need to Improve Facility Maintenance at King Abdullah II Special
Operations Training Center (Project No. D2015-D000CJ-0208.000) (D1547) (3328)

1. DODIG Report, DoD Inspector General, 2 February 2016, subject: same as above.
2. The Army Contracting Command (ACC) provides the enclosed comments in response to the referenced document.
3. The ACC POC is [REDACTED], Auditor, Internal Review and Audit Compliance Office, [REDACTED] or [REDACTED]

Encl

BRYAN R. SAMSON
Acting Deputy to the Commanding General

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U.S. Army Contracting Command–Rock Island (cont'd)



CCRC

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DEPARTMENT OF THE ARMY
ARMY CONTRACTING COMMAND – ROCK ISLAND
3055 RODMAN AVENUE
ROCK ISLAND, IL 61299-8000

REPLY TO
ATTENTION OF:


09 FEB 2016

MEMORANDUM FOR Inspector General, Department of Defense, 4800 Mark Center Drive, Alexandria, Virginia 22350-1500

SUBJECT: DODIG Audit Draft Report Project No. D2015-D000CJ-0208.000

1. Reference DODIG Audit Draft Report, U.S. Army Central and U.S. Army Contracting Command–Rock Island Need to Improve Facility Maintenance at King Abdullah II Special Operations Training Center, issued 02 February 2016, DODIG Project No. D2015-D000CJ-0208.000.
2. We have reviewed the subject audit draft report and recommendations. Our responses are provided in the attached document.
3. The POC is [REDACTED], CCRC-RA, COMM [REDACTED], email [REDACTED]

Encl


MELANIE A. JOHNSON
Principal Assistant Responsible
for Contracting

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U.S. Army Contracting Command–Rock Island (cont'd)

U.S. Army Central and U.S. Army Contracting Command–Rock Island Need to Improve Facility Maintenance at King Abdullah II Special Operations Training Center
DODIG Project No. D2015-D000CJ-0208.000

Finding: ARCENT and ACC–RI officials did not effectively maintain facilities at KASOTC. Specifically, The contractor did not install fire extinguishers and smoke detectors in the COIC latrines in accordance with the terms of the contract because the COR did not effectively monitor the contractor's performance.

Recommendation 1.a: ACC–RI, in coordination with ARCENT, should notify the contractor of the deficient performance and hold the contractor responsible, in accordance with the terms of the contract, for not providing and maintaining fire extinguishers and smoke detectors in the COIC latrines.

ACC-RI Comments: Concur. Contract Performance Work Statement (PWS) Section 5.7.3 requires the contractor to ensure that each latrine trailer is equipped with an operation 20lb (9kg) Class ABC fire extinguisher; and PWS 5.7.4 requires the contractor to provide battery operated smoke detectors in the COIC latrines.

The Quality Assurance Specialist (QAS) from the Contingency Contracting Administration Services (CCAS) team issued a non-conformance report on 20 October 2015 following their inspection. The contractor, KASOTC, corrected all deficiencies upon notification by installing fire extinguishers and smoke detectors as required. The fire extinguishers and smoke detectors are and will continue to be checked during monthly Contracting Officer Representative (COR) and QAS surveillances.

Finding: Mold/mildew accumulated within the showers at four lodging facilities because ACC–RI and ARCENT officials did not include a requirement in the contract to prevent and/or remove mold/mildew.

Recommendation 1.b(1): ACC–RI and ARCENT should review and modify the basic life support services contract, as necessary, to include measures designed to prevent and remove mold/mildew in all facilities consistent with AR 420-1.

ACC-RI Comments: Concur. PWS Section 5.2.2 states the contractor shall provide a daily cleaning for all communal bathrooms. All bathroom fixtures and interior structure, to included, toilets, sinks, showers, urinals, shelving, window sills, bide, floors, ceilings, walls, partitions, mirrors, stalls, dispensers, and hoses, shall be cleaned so that they are free of dust, dirt, lint, and human waste, and trash. The general cleaning requirement of the showers should have been sufficient to prevent mold/mildew.

ARCENT brought in an industrial hygienist to determine if the accommodations had hazardous mold and to make recommendations for corrective actions. The industrial hygienist determined that there was common mildew in the showers, not mold.

The CCAS team confirmed that based on recommendations from the industrial hygienist, KASOTC LLC took the following steps to remedy the mildew problem:

U.S. Army Contracting Command–Rock Island (cont'd)

U.S. Army Central and U.S. Army Contracting Command–Rock Island Need to Improve Facility Maintenance at King Abdullah II Special Operations Training Center
DODIG Project No. D2015-D000CJ-0208.000

- (1) Doors to showers were removed and replaced with shower curtains to allow for better ventilation to the shower stalls.
- (2) Shower stalls were re-caulked with anti-mold/mildew caulking in all accommodations to mitigate the issue with mildew build up.
- (3) KASOTC LLC is in the process of replacing windows in the shower areas with ventilation fans.

Section 5.2.2.1. Mold/Mildew has been added to the revised PWS for incorporation into the contract. Estimated date for incorporation of the revised PWS is 30 June 2016. The Quality Assurance Surveillance Plan has been updated to add surveillance of this Section.

Finding: ACC–RI officials did not incorporate the clause for safety of facilities, infrastructure, and equipment for military operations into the contract because ACC–RI officials mistakenly omitted the clause from the contract.

Recommendation 1.b(2): In order to mitigate life, health, and safety risks, ACC–RI, in coordination with ARCENT, should review and modify the basic life support services contract, as necessary, to include the DFARS clause 252.246-7004.

ACC-RI Comments: Concur. DFARS 252.246-7004 will be added to the contract no later than 30 March 2016.

Finding: The procedures for conducting heating, ventilation, and air conditioning (HVAC) repair and replacement for the COIC and the dining facility were ineffective because ARCENT and ACC–RI officials did not develop appropriate requirements in the contract for HVAC repair and replacement times;

Recommendation 1.b(3): In order to mitigate operational risk, ACC–RI, in coordination with ARCENT, should review and modify the HVAC response/repair/replacement times in the basic life support services contract, as necessary, to be consistent with priorities established in the USCENCOM regulation.

ACC-RI Comments: Concur. PWS Section 5.2.3. Heating, Ventilation, and Air Conditioning (HVAC) & Electric Power has been revised. Section 5.3.8. COIC Maintenance and Section 5.3.9. HVAC has been added to the revised PWS for incorporation into the contract, and estimated date of incorporation is 30 June 2016. The PWS revisions include repair times for HVAC systems in line with established USCENCOM regulations.

U.S. Army Contracting Command–Rock Island (cont'd)

U.S. Army Central and U.S. Army Contracting Command–Rock Island Need to Improve Facility Maintenance at King Abdullah II Special Operations Training Center
DODIG Project No. D2015-D000CJ-0208.000

The CCAS team confirmed that the COIC industrial HVACs are not part of the KASOTC BLS contract. The revised PWS will add this requirement, but currently the industrial HVACs are repaired through use of Acquisition Cross-Service Agreement (ACSA).

Finding: ARCENT and ACC–RI officials did not verify that KASOTC facilities received periodic maintenance in accordance with the contract because the ACC–RI contracting officer received the contractor's Quality Control Plan (QCP) without a periodic maintenance schedule, and ARCENT officials did not effectively oversee the contractor's performance.

Recommendation 1.c: ACC–RI and ARCENT should request a schedule of periodic maintenance from the contractor that includes all 18 periodic maintenance requirements.

ACC-RI Comments: Concur. The Contracting Officer and the COR requested KASOTC LLC to provide an updated QCP that includes a schedule of periodic maintenance covering all 18 areas identified in the findings. The updated QCP will be reviewed and the QASP will be updated accordingly with these 18 areas. However, it is noted the QASP provides guidance on essential areas that a COR should inspect and does not list every aspect individually. The CCAS QAS developed a surveillance checklist that mirrors the PWS and is the tool used for evaluation of the entire contract. These checklists have been in use since September 2015.

Acronyms and Abbreviations

ACC-RI	U.S. Army Contracting Command–Rock Island
ARCENT	U.S. Army Central
COIC	Combined Operations and Information Center
COR	Contracting Officer’s Representative
DFARS	Defense Federal Acquisition Regulations Supplement
FAR	Federal Acquisition Regulation
HVAC	Heating, Ventilation, and Air Conditioning
KASOTC	King Abdullah II Special Operations Training Center
PWS	Performance Work Statement
QASP	Quality Assurance Surveillance Plan
QCP	Quality Control Plan
UBM	Ultimate Building Machine
USCENTCOM	U.S. Central Command



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U.S. DEPARTMENT OF DEFENSE

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